

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	
)	CASE NO. 19 B 27531
Frank J Plowden,)	
)	HON. Timothy A. Barnes
)	CHAPTER 13
DEBTOR.)	

NOTICE OF MOTION

TO: Marilyn O Marshall, 224 South Michigan Ste 800, Chicago, IL 60604, via electronic court notification;

See attached service list.

Please take notice that on June 4, 2020, at 1:30 p.m. I shall appear before the Honorable Timothy A. Barnes in Courtroom 744 of the United States Bankruptcy Court, Everett McKinley Dirksen Building, 219 S. Dearborn Street, Chicago, Illinois 60604 and present the attached motion.

That a party who objects to the motion and wants it called must file a Notice of Objection no later than two (2) business days before the presentment date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion without a hearing before the date of presentment.

PROOF OF SERVICE

The undersigned, an attorney, certifies that he transmitted a copy of this notice and the attached motion to the above-named creditor and also to the attached service list via regular U.S. Mail with postage prepaid from the mailbox located at 20 S. Clark Street, Chicago, IL 60603 on May 12, 2020.

/s/ Alexander Nohr
Attorney for Debtors

The Semrad Law Firm, LLC
20 S. Clark Street, 28th Floor
Chicago, IL 60603
312-913-0625

ARS ACCOUNT RESOLUTION
PO BOX 459079
Fort Lauderdale, FL 33345-9079Label Matrix for local noticing
0752-1
Case 19-27531
Northern District of Illinois
Eastern Division
Tue May 12 16:00:47 CDT 2020219 S Dearborn
7th Floor
Chicago, IL 60604-1702CMRE. 877-572-7555
3075 E IMPERIAL HWY STE
BREA, CA 92821-6733(p)CREDITORS' DISCOUNT & AUDIT CO CDA
ATTN KEN ARMSTRONG
415 E MAIN ST
PO BOX 213
STREATOR IL 61364-0213City of Chicago
205 W Randolph # 1100
c/o Goldman and Grant
Chicago, IL 60606-1813City of Chicago - Parking and red Light Tick
121 N. LaSalle Street
Chicago, IL 60602-1202City of Chicago Department of Finance
c/o Arnold Scott Harris P.C.
111 W. Jackson Ste. 600
Chicago, IL 60604-3517ComEd
3 Lincoln Center
Bankruptcy Section
Oakbrook Terrace, IL 60181-4204Commonwealth Edison Company
Bankruptcy Department
1919 Swift Drive
Oak Brook, IL 60523-1502Daniel Landlord
6646 s Greenwood
Chicago, IL 60637-5255FIRST PREMIER BANK
c/o Jefferson Capital Systems LLC
PO Box 7999
c/o Linda Dold
Saint Cloud Minnesota 56302-7999FIRST PREMIER BANK
c/o Jefferson Capital Systems LLC PO Box
c/o Linda Dold
Saint Cloud, MN 56302Harris & Harris LTD
111 West Jackson Boulevard Suite 400
Chicago, IL 60604-4135Hawthorne, Miya
106 S. 6th Street
Springfield Illinois 62701IL Secretary of State
2701 S. Dirksen Parkway
Springfield, IL 62723-0002ILDCFS
106 S Sixth
Springfield, IL 62701Malloy, Daniel
6646 S. Greenwood Ave.
Chicago Illinois 60637-5255Peoples Gas
200 E. Randolph
Chicago, IL 60601-6302Premier Bankcard, Llc
Jefferson Capital Systems LLC Assignee
Po Box 7999
Saint Cloud Mn 56302-7999REGIONAL ACCEPTANCE CO
Po Box 1847
Wilson, NC 27894-1847RGS FINANCIAL
1700 JAY ELL DR STE 200
RICHARDSON Texas 75081-6788RGS FINANCIAL
PO Box 852039
Richardson, TX 75085-2039Rexford Automotives
14300 Pulaski Rd
Midlothian, IL 60445-2821Sullivan Urgent Aid Centers, Ltd
PO Box 1123
Minneapolis, MN 55440-1123T Mobile/T-Mobile USA Inc
by American InfoSource as agent
4515 N Santa Fe Ave
Oklahoma City, OK 73118-7901Union Auto
8700 S. CHICAGO AV
CHICAGO, IL 60617-2343Village of Crestwood
Municipal Collections of America, Inc
3348 Ridge Road
Lansing, IL 60438-3112Village of Crestwood
PO Box 6131
Carol Stream, IL 60197-6131Alexander P Nohr
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20 S. Clark Street, 28th Floor
Chicago, IL 60603-1811

Matthew W Wagar
The Semrad Law Firm LLC
20 S Clark Street
Chicago, IL 60603-1802

Patrick S Layng
Office of the U.S. Trustee, Region 11
219 S Dearborn St
Room 873
Chicago, IL 60604-2027

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

CREDITORS DISCOUNT & A
415 E MAIN ST
STREATOR, IL 61364

End of Label Matrix
Mailable recipients 34
Bypassed recipients 0
Total 34

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
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MOTION TO MODIFY PLAN

NOW COMES the Debtor, Frank J Plowden, by and through Debtor's attorneys, The Semrad Law Firm, LLC hereby moves this Honorable Court to Modify the confirmed Chapter 13 Plan, Debtors state the following:

1. On September 27, 2019, Debtor filed a petition for relief pursuant to Chapter 13 Title 11 U.S.C.
2. On December 12, 2019, this Honorable Court confirmed the Debtor's Chapter 13 Plan.
3. The Chapter 13 Plan allows for secured creditors to be paid 100% of their allowed claims, and general unsecured creditors without priority to be paid 100% of their allowed claims.
4. The Chapter 13 Plan requires the Debtor to make plan payments to the Chapter 13 Trustee in the amount of \$460.00 monthly for 60 months.
5. That during February of 2020, Debtor sustained a left foot injury, specifically plantar fasciitis, and was off work from the dates of February 17, 2020 to March 4, 2020. Please see Exhibit A, for Debtor's medical documentation.
6. That in addition, on April 1, 2020, Debtor's primary physician issued a note to Debtor's employer allowing Debtor to self-isolate at home throughout the duration of the Chicago "Shelter in Place" Order to Debtor's pre-existing respiratory condition. Please see Exhibit B, a note to Debtor's employer from his primary physician.

7. That Debtor is employed as a mill operator with Maruichi Leavitt Pipe & Tube, LLC.
Due to the Covid-19 pandemic and Debtor a higher at-risk individual, Debtor has been either off of work or working extremely limited hours. Please see Exhibit C for Debtor's recent pay advices showing a material reduction of income.
8. That on March 27, 2020, the Coronavirus Aid, Relief and Economic Security Act H.R. 748 (CARES ACT) was signed into law.
9. Under the CARES ACT, Section 1113(b) Debtors affected by the Covid-19 pandemic may petition the Court for plan modification, including, but not limited to extending the plan up to seven years from the date of confirmation.
10. That Debtor has paid over \$1,670.00 into his Chapter 13 plan.
11. That Debtor expected to return to work during the month of June 2020.
12. Debtor is in a position to make regular and ongoing trustee payments, if the payments are lowered to \$370.00 per month.
13. Debtor respectfully requests this Honorable Court defer the current plan default to the end of the plan of reorganization.
14. Debtor further requests this Honorable Court to decrease the current Chapter 13 plan payment to \$370.00 per month to ensure feasibility.
15. Debtor further requests this Honorable Court to extend the Debtor's Chapter 13 plan term to 84 months.
16. Debtor is in a position to proceed with the instant case.
17. Debtor filed the instant case in good faith and intends to complete the plan of reorganization.

WHEREFORE, the Debtor prays this Honorable Court for the following relief:

- A. That this Honorable Court enter an Order deferring the current plan default to the end of the Chapter 13 Plan of reorganization; and
- B. That this Honorable Court enter an Order decreasing the current Chapter 13 plan payment to \$370.00 per month; and
- C. That this Honorable Court enter an Order extending the Debtor's Chapter 13 plan term to 84 months; and
- D. For such other and further relief as the Court deems fair and proper.

Respectfully submitted,

/s/ Alexander Nohr
Attorney for Debtors

The Semrad Law Firm, LLC
20 S. Clark Street, 28th Floor
Chicago, IL 60603
312-913-0625